

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE WORLD TRADE CENTER LOWER : 21 MC 102 (AKH)  
MANHATTAN DISASTER SITE LITIGATION :  
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IN RE COMBINED WORLD TRADE CENTER : 21 MC 103 (AKH)  
AND LOWER MANHATTAN DISASTER SITE :  
LITIGATION (straddler plaintiffs) :  
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**DECLARATION OF CHRISTOPHER R. LOPALO**

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CHRISTOPHER R. LOPALO, an attorney duly licensed to practice before the Courts of the State of New York and admitted to the bar of this Honorable Court hereby Declares under penalty of perjury:

1. I am associated with Worby Groner Edelman & Napoli Bern, LLP, Counsel for certain Plaintiffs and submit this Declaration in support of Plaintiffs' Motion for and Extension of Time.
2. The relevant facts and law to this application are set forth in supporting Memorandum of Law and Facts filed concurrently with this Declaration.
3. Annexed to this Declaration are the following Exhibits:
  1. A true and correct copy of Order Amending Summary Order – August 2, 2011 Conference dated August 29, 2011;
  2. A true and correct copy of Order Enlarging Time to Submit Sworn Answers dated September 28, 2011;
  3. A true and correct copy of Amending Order Setting Revised Dates for Selecting Cases for Discovery dated October 5, 2011;
  4. A true and correct copy of Order Directing Special Masters Not To Proceed With Irregularly Sworn Cases dated November 8, 2011;

5. A true and correct copy of a list of Plaintiffs represented by Worby Groner Edelman & Napoli Bern, LLP who have signed and submitted updated certifications in response to the Court's November 8, 2011 Order;

6. A true and correct copy of a list of Plaintiffs represented by Worby Groner Edelman & Napoli Bern, LLP who are requesting an extension of time until December 2, 2011 to comply with the Court's November 8, 2011 Order.

Dated: November 14, 2011



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